


U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 10, 2015

By Regular Mail and ECF

Deborah Austern Colson
Colson & Harris LLP
80 Broad Street
19th Floor
New York, NY 10004

Re: United States v. Doris Henriette Yembe, 14-M-403

Dear Ms. Colson:

The government hereby produces the forensic psychiatric report of Dr. Stuart B. Kleinman. The government also produces materials that it provided to Dr. Kleinman, as listed below:

Document Type	Document description	Starting Bates #
Correspondence from Defendant	9/16/2014 letter from Yembe to Lerer	YEMBE-000001
	9/30/2014 letter from Yembe to Lerer	YEMBE-000004
	10/19/2014 letter from Yembe to Lerer	YEMBE-000016
	10/20/2014 letter from Yembe to Lerer	YEMBE-000036
	10/22/2014 letter from Yembe to Lerer	YEMBE-000042
	10/25/2014 letter from Yembe to Lerer	YEMBE-000043
	10/28/2014 letter from Yembe to Lerer	YEMBE-000048
	11/20/2014 letter from Yembe to Lerer	YEMBE-000053
Dr. Fossey Notes	Dr. Myrtis Fossey's notes on Doris Yembe, 2011	YEMBE-000062
	Dr. Myrtis Fossey's notes on Doris Yembe, 2012	YEMBE-000069

	Dr. Myrtis Fossey's notes on Doris Yembe, 2013	YEMBE-000073
	Dr. Myrtis Fossey's notes on Doris Yembe, 2014	YEMBE-000076
Court Transcripts	U.S. v. Yembe - 4/30/2014 Transcript	YEMBE-000082
	U.S. v. Yembe - 6/17/2014 Transcript	YEMBE-000098
	U.S. v. Yembe - 7/24/2014 Transcript	YEMBE-000104
	U.S. v. Yembe - 8/22/2014 Transcript	YEMBE-000109
	U.S. v. Yembe - 10/21/2014 Transcript	YEMBE-000113
	U.S. v. Yembe - 12/22/2014 Transcript	YEMBE-000133
Defendant's Statements	Yembe Post-arrest statement ROI, 5/7/2014	YEMBE-002102
	Yembe Proffer notes, 8/14/2014	YEMBE-002106
BOP Materials	Bureau of Prisons Health Services records for Doris Yembe	YEMBE-001970
	Yembe MDC emails ¹	YEMBE-000148
Court Papers	U.S. v. Yembe Complaint, signed 4/28/2014	YEMBE-002090
	Yembe Pro-se Habeas petition, 12/17/2014	YEMBE-002038
	Amended Verified Complaint, 6/4/2014	YEMBE-002064
Other	Forensic-Psychiatric Evaluation of Doris Yembe by Dr. Alexander Bardey, 12/18/2014	YEMBE-002124
	Yembe YouTube video	YEMBE-002131

¹ These e-mails include e-mails between the defendant and counsel. The government has instructed Dr. Kleinman not to review e-mails between the defendant and counsel. However, the government reserves the right to use these e-mails in the future, including in these competency proceedings. See United States v. Walia, No. 14-CR-213 (MKB), 2014 WL 3734522, at *16 (E.D.N.Y. July 25, 2014); United States v. Asaro, No. 14-Cr-26 (ARR), slip op. (E.D.N.Y. July 15, 2014).

The government requests reciprocal discovery of all materials provided to Dr. Alexander Sasha Bardey.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: /s/ Justin D. Lerer
Justin D. Lerer
Assistant U.S. Attorney
(718) 254-6124

cc (by ECF and Hand w/o supporting materials): Hon. Robert M. Levy